UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

DANA BERNHARDT et al.,	)	
	)	
Plaintiffs-Appellants,	)	
	)	
v.	)	**Case No. 21-7018**
	)	
ISLAMIC REPUBLIC OF IRAN et al.,	)	
	)	
Defendants-Appellees.	)	

STATEMENT OF ISSUES TO BE RAISED

As directed by the Court's Order filed March 1, 2021 [1530091], appellants Dana Bernhardt et al. ("Plaintiffs-Appellants") hereby submit the following as the nonbinding statement of issues to be raised in this case:

1.   Whether Plaintiffs-Appellants sufficiently alleged a basis for personal jurisdiction over HSBC Holdings Plc and HSBC Bank Plc that is consistent with the Due Process Clause of the Fifth Amendment and Rule 4(k)(2)?

2.   Whether Plaintiffs-Appellants sufficiently alleged that HSBC Bank USA, N.A. ("HBUS") and HSBC North America Holdings Inc. ("HBNA") are liable under the Justice Against Sponsors of Terrorism Act, Pub. L. No. 114-222, 130 Stat. 852 (2016), as incorporated within 18 U.S.C. § 2333(d)(2) ("JASTA"), for aiding and abetting the terrorist acts at issue?

3.   Whether Plaintiffs sufficiently alleged that HBUS and HBNA were liable under JASTA as part of an international conspiracy to finance terrorist activities by entering into a conspiracy to evade American economic sanctions that were erected for the purpose of preventing terrorist acts and by engaging in high-risk transactions with banks known to finance terrorists?

Respectfully submitted,

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